



GERALDEVE

Examination of the Kirklees Local Plan

Hearing Statement: Matter 32 (Site Ref. MX1930)

On behalf of: Empire Knight Group



GERALDEVE

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1 Introduction

- 1.1 This Hearing Statement is prepared on behalf of Empire Knight Group and responds to the Stage 4 Matters, Issues and Questions (MIQs) raised by the Inspector (ID: EH13.2). Specifically, this Hearing Statement addresses those MIQs relating to site reference MX1930 (land north of Blackmoorfoot Road, Crosland Moor, Huddersfield).

Background

- 1.2 Empire Knight Group is the freehold owner of the proposed allocation identified in Kirklees Borough Council's ("the Council") Local Plan as site MX1930 ("the site"). The site is identified as being suitable for a mixed use development with an indicative capacity to deliver 441 dwellings and 44,258 sq m of employment floorspace.
- 1.3 Since March 2017, Empire Knight Group has been in discussion with the Council over the proposed allocation of the site. Such discussions have focused on the likely achievable mix of land uses and the fact that the employment element of the proposed allocation is not considered to be deliverable. This is reflected in the Statement of Common Ground between Empire Knight Group and the Council (ID: SC005).
- 1.4 In September 2017, Empire Knight Group submitted a formal pre-application request (ref. 2017/20381) to the Council for a development comprising up to 625 residential dwellings (Use Class C3), up to 70 extra care apartments (Use Class C2) and associated development at the site.
- 1.5 Following ongoing community consultation and discussion with the Council, the proposals have been modified and it is anticipated that an outline planning application will be submitted in mid-February for a residential-led mixed use development comprising up to 630 residential dwellings (Use Class C3), up to 70 care apartments (Use Class C2/C3/D1), a local centre of up to 500 sq m (Use Class A1/A2/A3/A4/A5/D1) as well as associated development.

Purpose of Representations

- 1.6 Whilst Empire Knight Group supports the proposed allocation of the site for development it is considered that, as currently drafted, the allocation is not effective or justified in accordance with paragraph 182 of the National Planning Policy Framework (NPPF). This is because the proposed employment provision at the site is not considered to be viable or deliverable.

- 1.7 Unlike employment, higher value residential development is considered to be viable and deliverable, albeit the viability is likely to be marginal. This is evidenced by Empire Knight Group's proposed outline planning application for the site, which seeks to deliver a residential-led development, with associated and supporting land uses.
- 1.8 Taking into account the above, it is considered that the following Main Modifications are required in order to ensure the allocation is justified and effective in accordance with paragraph 182 of the NPPF:
- Amend the site's allocation from mixed-use to housing;
 - Remove reference to the delivery of employment land at the site;
 - Amend the indicative housing capacity for the allocation from 441 to 700 dwellings;
and
 - Amend the housing delivery and phasing table at Appendix 3 of the Local Plan to take account of the amended housing target for the site.
- 1.9 Further detail and evidence in relation to the above is set out in the remainder of this Statement.
- 1.10 For context, and to support the proposed Main Modifications, a copy of Empire Knight Group's pre-application presentation (which includes a copy of the latest masterplan for the site) to Members of the Strategic Planning Committee on the 11 January 2018 is attached at **Appendix A**.

2 Matter 32: Huddersfield Mixed-Use Allocations

Issue

Are the proposed mixed use allocations in Huddersfield justified, effective, deliverable and in line with national policy?

Questions

a.) What is the relationship between sites MX1930 and H481? Should they be combined in a single text box/policy and a joint masterplan required?

- 2.1 Other than being situated in close proximity to one another, it is considered that there is no material relationship between sites MX1930 and H481. The sites are under different land ownerships and the current employment uses on each site (a firework storage and distribution compound for MX1930 and caravan sales/rental site for H481) are not linked. Furthermore, whilst both sites currently have a shared access from Standard Drive, the upcoming planning application in relation to site MX1930 will lead to two separate, independent accesses being created.
- 2.2 With regard to combining the allocations, this is not considered necessary to address the soundness of the Local Plan. Furthermore, it is considered that combining the allocations and the requirement for a joint masterplan at this late stage could severely delay the delivery of site MX1930.
- 2.3 Both sites are at different stages in terms of preparation, and whilst the intentions of Empire Knight Group to develop site MX1930 are evident given the forthcoming planning application at the site, the landowner's development options and timescales for the delivery of site H481 are unknown.
- 2.4 The sites are also under different ownerships. The combining of the allocations would lead to multiple landowners for the allocation, which is likely to severely delay the delivery of a large strategic allocation such as this due to the competing needs of the separate landowners.
- 2.5 The separate allocation of site MX1930 and H481 is supported and is considered to be sound.

b.) How was the proposed mix and proportion of uses on site MX1930 determined? Is there evidence that this mix is viable and deliverable? What type/form of employment floorspace is envisaged? What are the early findings from the landowner's financial viability and market potential review, as referenced in the Statement of Common ground (SC005)?

2.6 For ease of reference, question b.) has been broken down into each of the four individual questions.

How was the proposed mix and proportion of uses on site MX1930 determined?

2.7 The Council's Part 2: Site Allocation Methodology document (ID: **BP23**) explains the approach taken to establish the proposed mix and proportion of uses on mixed use allocations, including MX1930.

2.8 Paragraph 4.26 of the Methodology sets out that for mixed use allocations:

"The capacity on proposed mixed use sites will be estimated using a 50/50 ratio of housing to employment provision unless there is specific evidence to indicate otherwise, such as a detailed ratio in a master plan or other accompanying document or where the location or other characteristic of the individual site suggests otherwise. The capacity for housing and employment on each portion of the site will be calculated in the same way as for sites wholly proposed for housing or employment. In all cases the estimated capacity is based on the remaining developable area of a site once any constrained area has been removed."

2.9 For the purposes of calculating the housing capacity, the Methodology uses a standard development density of 35 dwellings per hectare. For employment capacity, the Methodology applies a standard ratio of area/employment type as follows: B1a = 10%; B1b = 10%; B1c = 10%; B2 = 60%; and B8 = 10%.

2.10 At the time that the site's capacity was calculated, Empire Knight Group had not yet made a formal decision on the future of the site. As such, there was no site specific information presented to the Council during the statutory consultation periods that would have informed a deviation from the standard methodology. Subsequently, the above standard calculations were applied to the developable area of the site on a 50/50 basis i.e. 12.65 ha for housing and 12.65 ha for employment.

Is there evidence that this mix is viable and deliverable?

- 2.11 As outlined, due to there being no site specific information available at the time the site's capacity was calculated, the Council established the mix of uses through applying its standard methodology for mixed use allocations.
- 2.12 Following the submission of the Local Plan for examination, Gerald Eve LLP prepared a Market Review. This document was submitted to the Council as part of the pre-application request for the site in September 2017. Due to the commercially confidential nature of this Review, an edited version is attached at **Appendix B**. Please note that the evidence and findings remain the same.
- 2.13 The purpose of this document was to assess the potential of the site in delivering the employment floorspace element of the proposed allocation.
- 2.14 The Market Review assessed the site's characteristics and employment market conditions within the local area and concluded that the employment floorspace at the site would be undeliverable. The reasons for this are summarised below:

Site Characteristics

- 2.15 Having assessed the site, the Market Review identified a number of site constraints that would impact the feasibility of employment development at the site, namely:
- Transport - access to the Motorway and strategic road networks is poor for commercial traffic and the immediate road network is unlikely to be suitable for increased Heavy Goods Vehicles (HGV) traffic;
 - Level changes within the site – the site includes a level change of approximately 50 metres from west to east and this may constrain unit sizes and positions and would require significant earthworks incurring unviable costs;
 - Ground conditions – the site's historic and current land uses mean that extensive and costly remediation works would be required;
 - Potential service/utility constraints – could require significant improvements to existing network in order to accommodate large-scale employment uses. Again, these works would incur significant cost.

Market Supply and Demand

- 2.16 There is a high level of employment floorspace currently available on the market in the surrounding area (circa 15,800 sq m), which demonstrates that there is good level of market supply. However, historical take-up levels demonstrate that employment demand for the Crossland Moor area is low (approximately 1 ha per annum over 8 years).
- 2.17 Applying this historic level of take up to the site (i.e. delivering approximately 44,000 sq m of employment floorspace) would mean that the proposed employment provision could take approximately 90 years to be fully let (i.e. 1 ha per 8 years for 12.5 ha overall). This would make this an unviable return for developers. Even if a more optimistic approach was adopted by doubling the take up, this would result in the take up period for the site equating to approximately 45 years.
- 2.18 The market testing undertaken illustrated that the road network infrastructure impacts the site's desirability and it is considered that it would be difficult to attract high profile or larger occupiers to the site. Instead, take up would most likely be through local independent businesses. This would have an impact on the likely achievable rental values and yields that could be achieved and would therefore impact on the overall value of the employment space. When coupled with the site's physical and locational constraints, such as the need for extensive remediation, such development would not be commercially viable.
- 2.19 It is considered that if this evidence were to have been available to the Council during the capacity calculation period, it is unlikely that the site would have been part-allocated for employment. Instead, it is more likely that the site would have been allocated for an entirely residential development.
- 2.20 Assuming this had been the case, this could have resulted in the site being allocated for approximately 886 dwellings (i.e. applying the standard 35 dwellings per ha to the developable area). However, given the site specific work undertaken to date by Empire Knight Group in support of the forthcoming planning application (such as the masterplanning process), it is considered that a capacity of 700 dwellings is appropriate for the site.
- 2.21 This level of residential development at the site is considered to be both viable and deliverable, as demonstrated by Empire Knight Group's decision to pursue a residential-led development proposal at the site. However, due to the site constraints, the essential infrastructure required for the development of the site and the likely developer contributions for off-site works and services, the viability of such development is marginal. This marginal

viability position formed the basis of Empire Knight Group's support for the Council's bid for Marginal Viability Funding in September 2017 for junction improvements in the local highway network.

2.22 To be clear, the resulting values of employment development would not be high enough to generate a satisfactory return or income for a developer. The likely residential values for the area would result in sufficient profit to incentivise the landowner; albeit the profit on cost is marginal.

2.23 In summary:

- Employment development is not considered to be viable or deliverable at the site. This is due to the site's characteristics and the supply and demand context of the local market, as evidenced through the Market Review.
- It is unlikely that the site would have been part allocated for employment uses in the Local Plan were this evidence to have been submitted the Council at an earlier stage. Instead it is more likely that the site would have been allocated for an entirely residential development.
- Assuming a Main Modification resulting in a residential development allocation is supported, the site is considered to be appropriate for up to 700 dwellings; and
- This level of residential development is considered to be viable and deliverable at the site, although only marginally.

What type/form of employment floorspace is envisaged?

2.24 It is unclear from the policy/text box what type/form of employment floorspace is envisaged. Other than an indicative floorspace capacity of 44,258 sq m no further information is set out.

2.25 Notwithstanding this, it is Empire Knight Group's position that employment floorspace is not viable or deliverable at the site.

What are the early findings from the landowner's financial viability and market potential review, as referenced in the Statement of Common ground (SC005)?

2.26 Please refer to paragraphs 2.11 to 2.23 above and the Market Review and at **Appendix B**.

c.) What is the position regarding the current employment uses on the site? At what stage is relocation anticipated, and how will this affect the phasing of development?

- 2.27 Empire Knight Group is the freeholder owner of the site and it currently leases approximately 17 ha of the site to Black Cat Fireworks Limited (BCF). The remainder of the site comprises low-grade, tenanted agricultural land and grassland.
- 2.28 BCF is a firework retailer and distributor. It currently uses the site as a storage and distribution compound where it carries out a range of services covering firework sales, logistics, warehousing, technical support and trading advice, marketing and design. The compound comprises a varied mixture of office buildings, sheds, reinforced storage buildings and shipping containers (making a total of 43 buildings/containers) linked by several access roads and parking/storage bays.
- 2.29 BCF is currently seeking an alternative site to relocate to. For reasons of commercial confidentiality, further detail on this relocation strategy cannot be outlined at this stage. However, it is likely that the site will be vacant and available for development by 2019/2020. These timescales ensure that development can start in line with the timescales set out in the Local Plan (i.e. delivery of the first homes on the site by 2022/23) and are common ground between Empire Knight Group and the Council (**ID:SC005**).
- 2.30 In terms of phasing, the current use of the site by BCF does not impact on the phasing strategy. As the site is currently used as a firework storage and distribution compound, it is licensed and regulated by the Health and Safety Executive (HSE) for the purpose of the Explosives Regulations 2014 (License No. X1/411/22854). It is also regulated by the HSE with respect to the Control of Major Accident Hazards Regulations 2015 (COMAH), with the site being identified as an 'Upper Tier' establishment (site ref: H12174).
- 2.31 In order for development to commence, the Explosive Regulations Licence would need to be surrendered and the revocation of the site as a COMAH Establishment would need to take place. This process would mean that BCF could no longer operate from the site. As such, it is not possible for the site to be phased/delivered to allow BCF to continue to operate, where other areas of the site are developed.
- 2.32 It should be noted that Empire Knight Group has sought legal advice regarding the surrendering of the Explosive Regulations Licence and the revocation of the site as a COMAH Establishment. This advice confirms that the Council could grant outline planning permission, on the basis that any such permission is accompanied by an obligation or

Grampian condition preventing the implementation of the planning permission unless and until the Explosives Licence and the site's designation as a COMAH Establishment has been surrendered. This position has been agreed with the Council during the pre-application process.

d.) Does the Plan provide sufficient detail regarding the protection of non-developable BAP Priority Habitat in the norther section of site MX1930?

2.33 The policy/text box makes it clear that the BAP Priority Habitat does not form part of the developable area for the allocation. Further, such areas are protected through other Local Plan policies, such as Policy PLP30. Subsequently, it is considered that the Local Plan, when read as a whole, provides sufficient detail regarding the protection of such land.

2.34 It is also important to note that as part of the forthcoming planning application at the site, a comprehensive protected species surveys and a full ecological assessment will be submitted. Whilst the full results of this will be set out as part of the planning application process, the initial results indicate that there will be no direct impacts from habitat clearance in such areas to accommodate development and that there is the opportunity for enhancement as part of the wider development.

e.) Has the impact of the proposal on heritage assets been adequately assessed and addressed? Should protection and mitigation measures linked to the Heritage Impact Assessment (LE99) be specified in the Plan?

2.35 The Council has prepared a site specific Heritage Impact Assessment (**ID: LE99**) in support of the proposed allocation of the site. As set out at paragraph 2.1, the Assessment has been prepared in accordance with Historic England's guidance 'The Setting of Heritage Assets' and has assessed the proposal and its impact on any heritage assets using the following four steps:

“Step 1: Identify the heritage assets and their settings affected by the allocation.

Step 2: Assess the contribution of the setting to the heritage asset.

Step 3: Assess the effect of the proposed allocation on the significance of the asset.

Step 4: Assess the options for mitigation in order to maximise the enhancement and minimise harm.”

- 2.36 Such an approach is considered to be robust and ensures a) that the site's surrounding heritage assets are duly taken into account and b) provides a useful resource for identifying potential mitigation measures for development proposals in the future.
- 2.37 In relation to the mitigation measures outlined within the Assessment, it is not considered that these should be set out within the policy/text box. Rather, it is considered that site specific mitigation measures relating to future development should be addressed at the planning application stage. This is clearly envisaged by the Council through the requirement for any application at the site to be accompanied by a Heritage Impact Assessment.
- 2.38 Furthermore, the requirement for site specific mitigation to be agreed at the application stage is also implied at paragraph 6.1 of the Council's Assessment, which outlines:

“The advice below has been given in order to provide guidance on how the harm to the heritage assets may be mitigated. Each one of these options needs to be explored further as part of the design process for the site but this list is not exhaustive and alternative options should also be considered. Any mitigation / enhancement options need to be discussed and agreed with Kirklees Planning and Development.”

- 2.39 To support the forthcoming planning application at the site, a Historic Environment Desk-based Assessment has been completed, which accords with the Council's Assessment. A copy of Assessment's Non-Technical Summary is attached at **Appendix C** for information, and to demonstrate that a residential-led scheme would preserve the historic environment in line with the Council's Assessment.

f.) Are the sites available and deliverable in the timescales envisaged?

- 2.40 In terms of availability, paragraphs 2.27 to 2.29 demonstrate that the site is available for development in the timescales envisaged in the Local Plan.
- 2.41 Regarding deliverability, it is considered that the current mixed use allocation is not deliverable. This is due to the issues associated with employment development at the site (as set out in response to question b. above). However, a wholly residential allocation is considered to be viable and deliverable at the site. This is demonstrated by the Empire Knight Group's upcoming planning application for a residential-led development (due to be submitted in mid-February 2018).
- 2.42 In terms of timescales, Appendix 3 of the Local Plan currently predicts that the housing element of the allocation will be completed in 2027/28. This is illustrated in the table below.

Year	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28
Annual Delivery	0	0	0	0	44	80	80	80	80	77
Cumulative Delivery	0	0	0	0	44	124	204	284	364	441

2.43 However, as discussed in relation to question b), if it is assumed that the allocation is amended to a residential allocation, it is considered that the site can realistically deliver up to 700 dwellings. This would result in the timescales for the allocation being amended in the Local Plan, as follows

Year	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32
Annual Delivery	0	0	0	0	44	80	80	80	80	80	80	80	80	16
Cumulative Delivery	0	0	0	0	44	124	204	284	364	444	524	604	684	700

2.44 With the above in mind, it is considered that a Main Modification to a residential allocation, to be delivered in line with the indicative timescales set out above, is both justified and effective in accordance with paragraph 182 of the NPPF.

3 Summary and Recommendations

- 3.1 This Hearing Statement is prepared on behalf of Empire Knight Group and responds to the MIQs relating to site reference MX1930 (land north of Blackmoorfoot Road, Crosland Moor, Huddersfield). The site is currently proposed to be allocated as a mixed use development with an indicative capacity to deliver 441 dwellings and 44,258 sq m of employment floorspace.
- 3.2 Empire Knight Group is the freehold owner of the proposed allocation and is in the latter stages of preparing an outline planning application at the site for a residential-led mixed use development comprising up to 630 residential dwellings (Use Class C3), up to 70 care apartments (Use Class C2/C3/D1), a local centre of up to 500 sq m (Use Class A1/A2/A3/A4/A5/D1) as well as associated development.
- 3.3 In responding to the Inspector's MIQs for the site, this Statement demonstrates that employment development is not viable or deliverable. This is due to the site's characteristics and the supply and demand context of the local employment land market. Subsequently, it is considered that, as currently drafted, the allocation is not effective or justified in accordance with paragraph 182 of the National Planning Policy Framework and is therefore unsound.
- 3.4 However, a wholly residential or residential-led development is considered to be viable and deliverable. This is evidenced by Empire Knight Group's proposed development for the site and forthcoming planning application, which is due to be submitted in mid-February 2018.
- 3.5 Given the above, it is considered that the following Main Modifications are required in order to ensure the allocation is both justified and effective:
- Amend the site's allocation from mixed use to housing;
 - Remove reference to the delivery of employment land at the site;
 - Amend the indicative housing capacity for the allocation to 700 dwellings; and
 - Amend the housing delivery and phasing table at Appendix 3 of the Local Plan to take account of the amended housing target for the site.
- 3.6 No other main modifications to the allocation are considered necessary in order to address the soundness of the Local Plan. However, the representations submitted by Empire Knight Group in respect of Matter 26 are to be noted.

Appendix A

**Pre-Application Presentation to the Council's Strategic Planning Committee (11
January 2018)**

REFERENCE
PL1713

PROJECT

**CROSLAND MOOR,
HUDDERSFIELD**

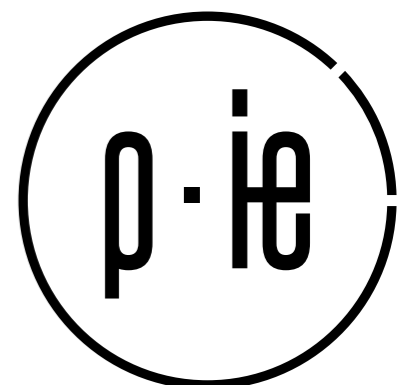
DOCUMENT

PRE-APPLICATION PRESENTATION

CLIENT
GERALD EVE

STATUS
DRAFT

DATE
09/01/18



1

MASTERPLAN DRIVERS

1.1 Landscape character



1. Traditional farming [grazing, silage and hay making]



2. Industrial [fireworks factory]



3. Managed recreational land and small scale agricultural fields




4. Green Belt

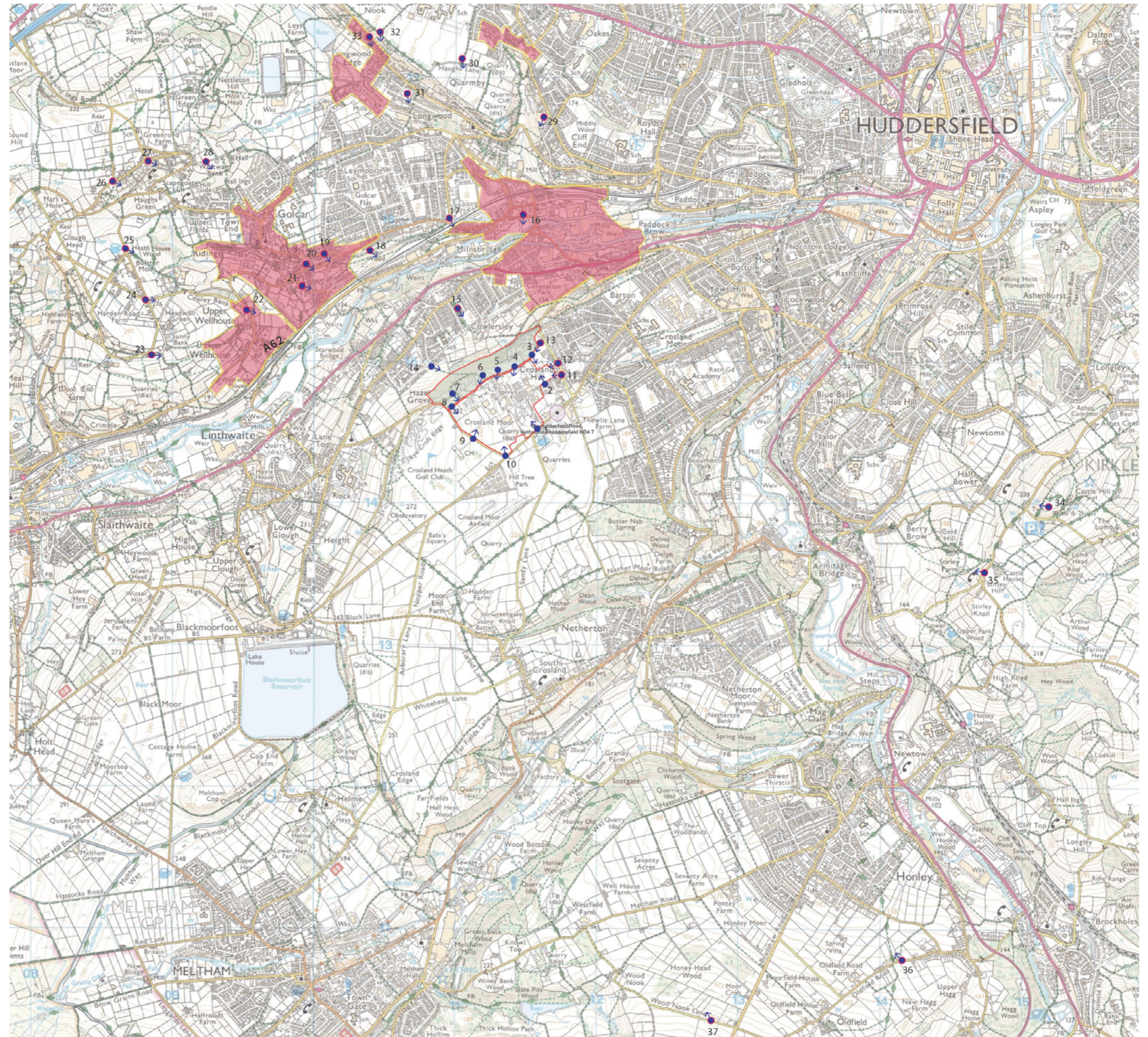


1.2 Visual assessment

KEY POINTS

- 37 view points have been tested in the field.
- Most sensitive visual receptors are the users of the footpath along the northern edge of the site (close up) who are likely to be focused on the landscape.
- There will also be sensitive views from users of the footpaths within the open parts of the village along Quarry Road and Crossland Hill Road, where there are a number of listed buildings in close proximity. Although it should be noted that we do not consider the impact to be significantly more than occurs already from the existing site buildings and adjacent new development.
- Views from footpaths to the north along the base of the valley and also along the higher ground towards Golcar, which will also be sensitive in terms of users of the footpath. However, intervening topography and planting reduces the significance of any impact. Change will be more noticeable around the crest of the hillside along Rye Croft Edge - subject to the proximity of new buildings to the edge, although new planting could be used to mitigate impacts.
- Views from the north-south looking towards the existing barn will also be sensitive to change in terms of development of the north western fields within the site.
- There are a number of distant views from existing footpaths and residential areas, and from with conservation areas. However, change becomes less perceivable along the higher slopes above Longwood and Golcar. Where change is perceivable, particularly within Golcar Conservation Area, mitigation can be introduced to mitigate any impacts on the valley crest, in the form of intermittent planting.
- Kinetic views along Blackmoorfoot Road and Felks Stile Road are less sensitive.

 Conservation Area



EXAMPLE VIEWS:



4. USERS OF CLOSED FOOTPATH ALONG NORTHERN EDGE OF SITE



11. GLIMPSED VIEW THROUGH LISTED BUILDINGS AT FARMHOUSE COURT



21. USERS OF THE FOOTPATH ALONG STATION RD (CONSERVATION AREA)

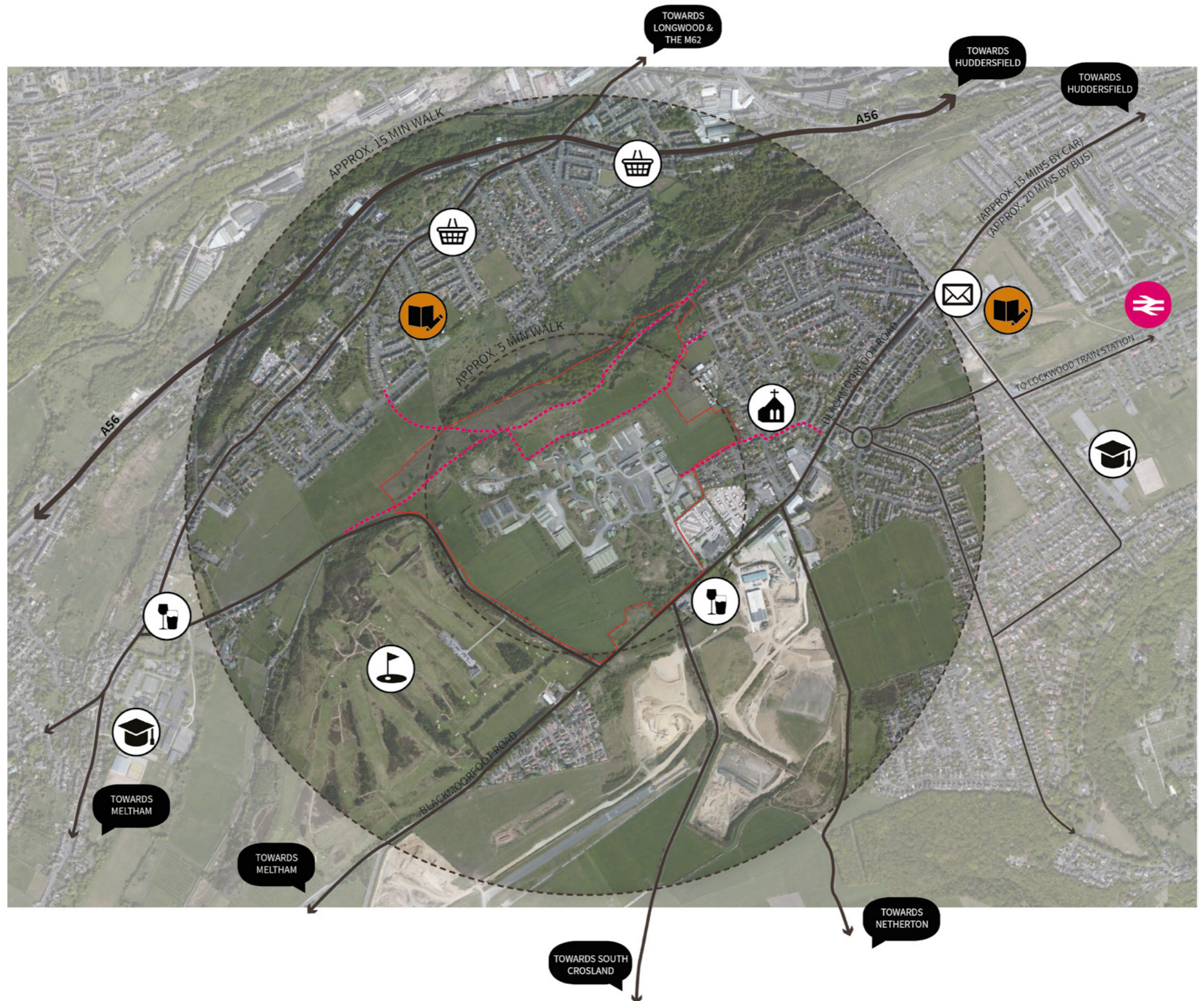


28. KINETIC VIEW ALONG HOLIN HALL LANE

1.3 Facilities

KEY POINTS

- Although the site lies on the edge of the built up area of Huddersfield, there are a number of existing community facilities within walking distance of the site
- There are two existing primary schools within walking distance and two secondary schools just beyond 15 mins walk from the site.
- Existing shopping facilities are located to the north of the site, down the hill within Cowlersley
- Huddersfield city centre is approximately 3 km, north eastwards and is best accessed along Blackmoorfoot Road. Several buses serve this route.
- The surrounding countryside and existing footpaths are easily accessible from this location.

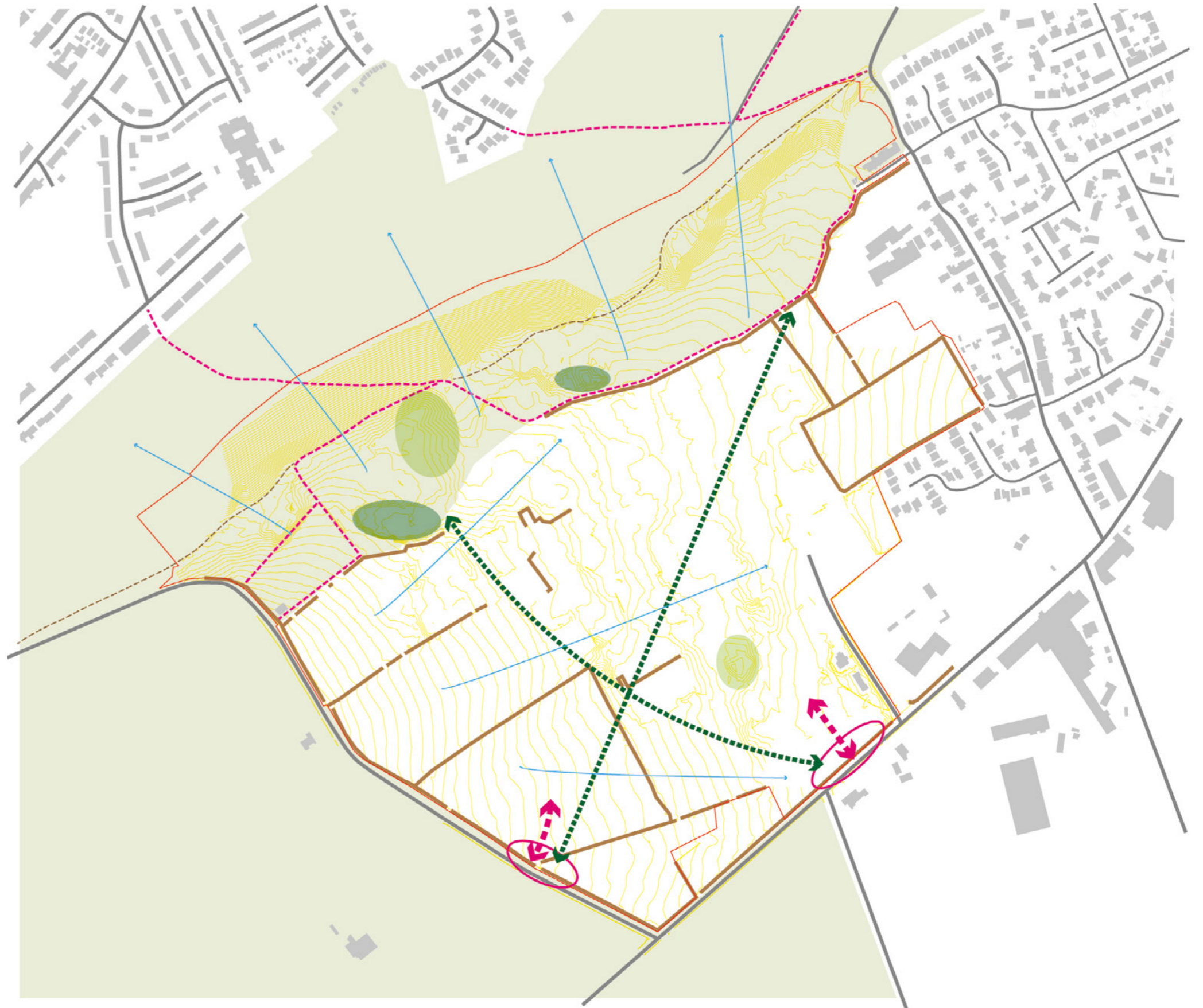


1.4 Opportunities and Constraints

KEY POINTS

- The site topography presents both opportunities and challenges. Development along steep hillsides are a feature of Huddersfield, this site can become an addition to that existing character.
- Disused quarries and existing mounds offer unique and unusual opportunities for public open space and play facilities
- Views in and out of the site are wide ranging. A sensitive design response will minimise the impact of any development seen from across the valley whilst offer magnificent views outwards for new residents.
- A network of footpaths, both existing and new, can open up the site providing access to surrounding neighbourhoods and the countryside beyond.
- Existing site features, tree belts, stone walls, remnants of the factory buildings, disused farm buildings offer the opportunity to retain these features where possible to create a scheme which is truly unique and of it's place.
- There is the potential for two access points into the development off Blackmoorfoot Road and Felks Stile Road

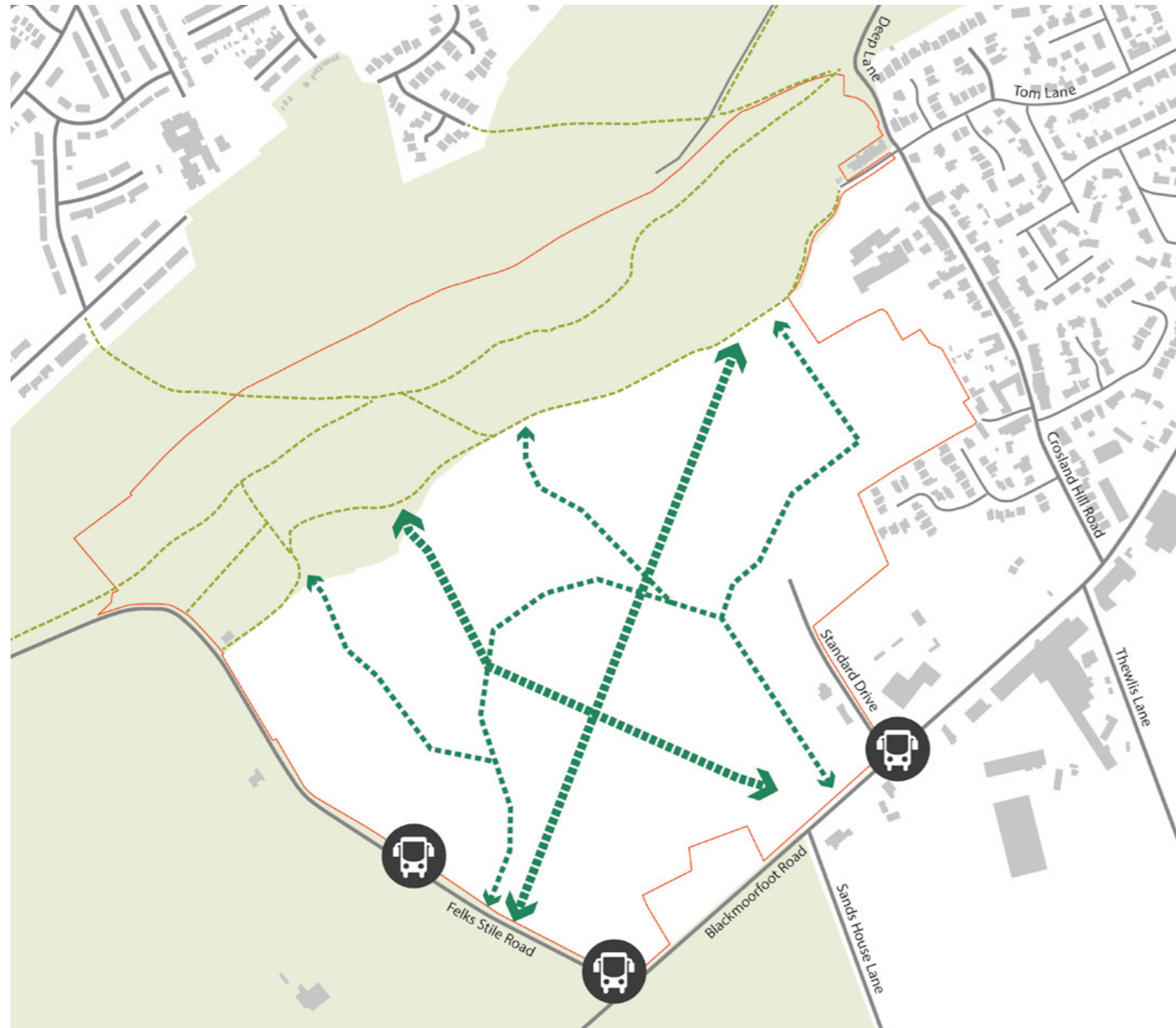
-  Green Belt
-  Existing public footpaths
-  Existing track
-  Existing areas of high ground (mounds)
-  Existing areas of excavated ground (former quarries)
-  Existing topography
-  Existing stone walls
-  Potential access into the site
-  Potential vehicular access
-  Potential footpath connections across the site
-  Views out of the site across the valley and towards the surrounding countryside





2
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DESIGN PRINCIPLES

IMPROVE THE CONNECTIVITY OF THE AREA & ENCOURAGE SUSTAINABLE MOVEMENT



- Improve connectivity to existing community facilities including two existing primary schools to the north of the site and shopping facilities to the north of the site
- Take advantage of existing public transport services providing direct access into Huddersfield centre and surrounding areas
- Connect into existing pedestrian and cycle routes, enhancing opportunities for leisure, exercise and play whilst improving the overall connectivity of the area.

WORK WITH THE EXISTING TOPOGRAPHY & CREATE SUSTAINABLE DRAINAGE



- The topography of the site is quite unique. It is made up of natural gradients, old quarry sites and man made platforms
- The masterplan must work with the existing contours to create developable areas and a successful urban drainage system
- Changes in level can also contribute to interesting areas of public realm and open space.

CREATE A NETWORK OF GREEN SPACES WHICH ENHANCE THE EXISTING LANDSCAPE



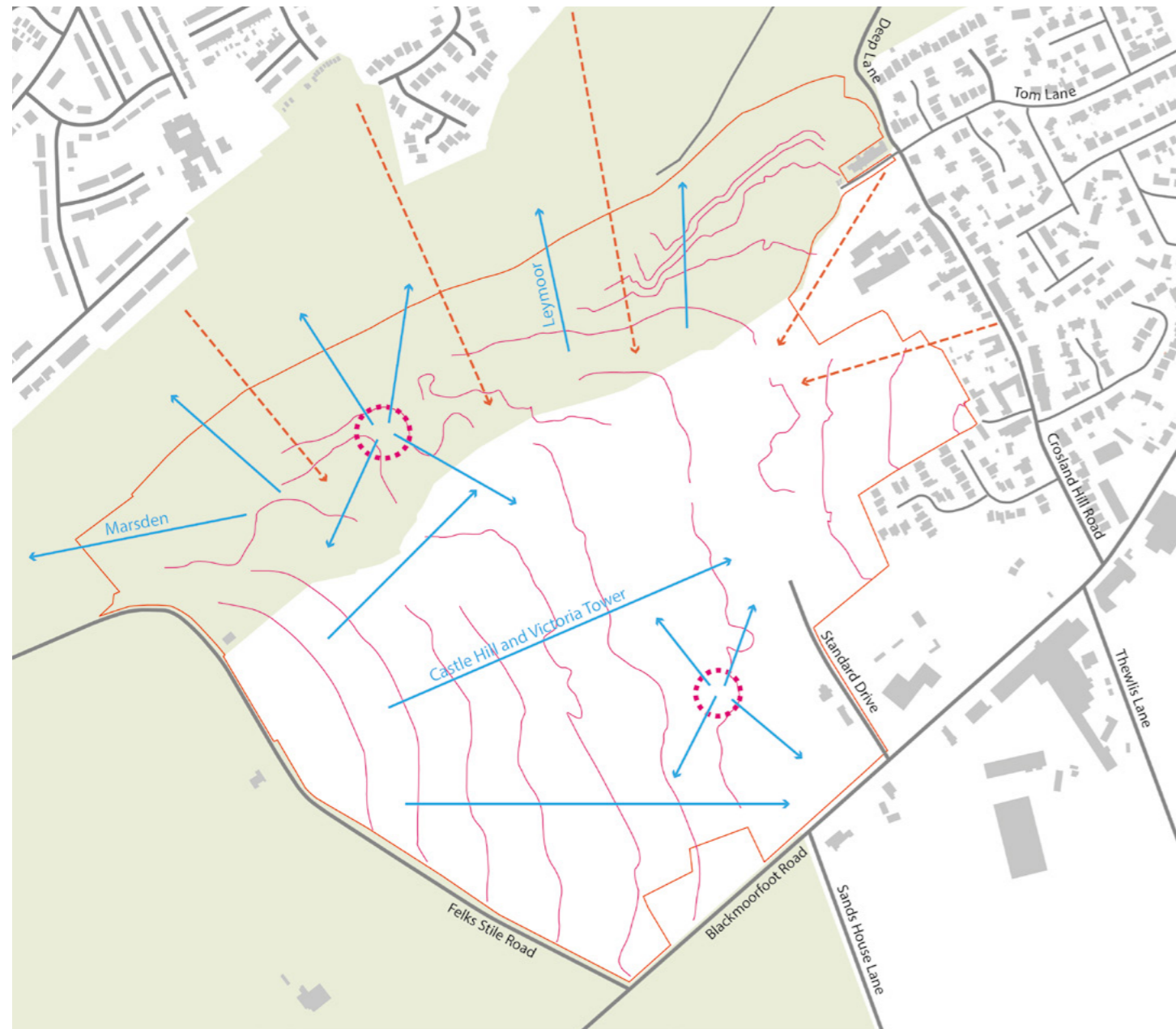
- Improve access to land to the north of the site to form a community parkland area, improving views and access to green space for new and existing residents whilst ensuring that sensitive views back towards the site remain protected and visually attractive
- Community parkland area could include areas for natural play, enhanced pathways for pedestrians and cyclists and improved signage and wayfinding
- Maximise the amount of green space within the site to encourage biodiversity and to retain habitats for wildlife around the site.

SENSITIVE RESPONSE TO DIFFERING EDGE CONDITIONS



- The site has differing edge conditions which it must respond to. These include:
 - The Green Belt valley edge
 - The rural lane
 - The back of existing housing areas and;
 - The main road frontage
- Each edge and its specific requirements must be considered carefully and designed appropriately.

BE MINDFUL OF VIEWS INTO AND OUT OF THE SITE



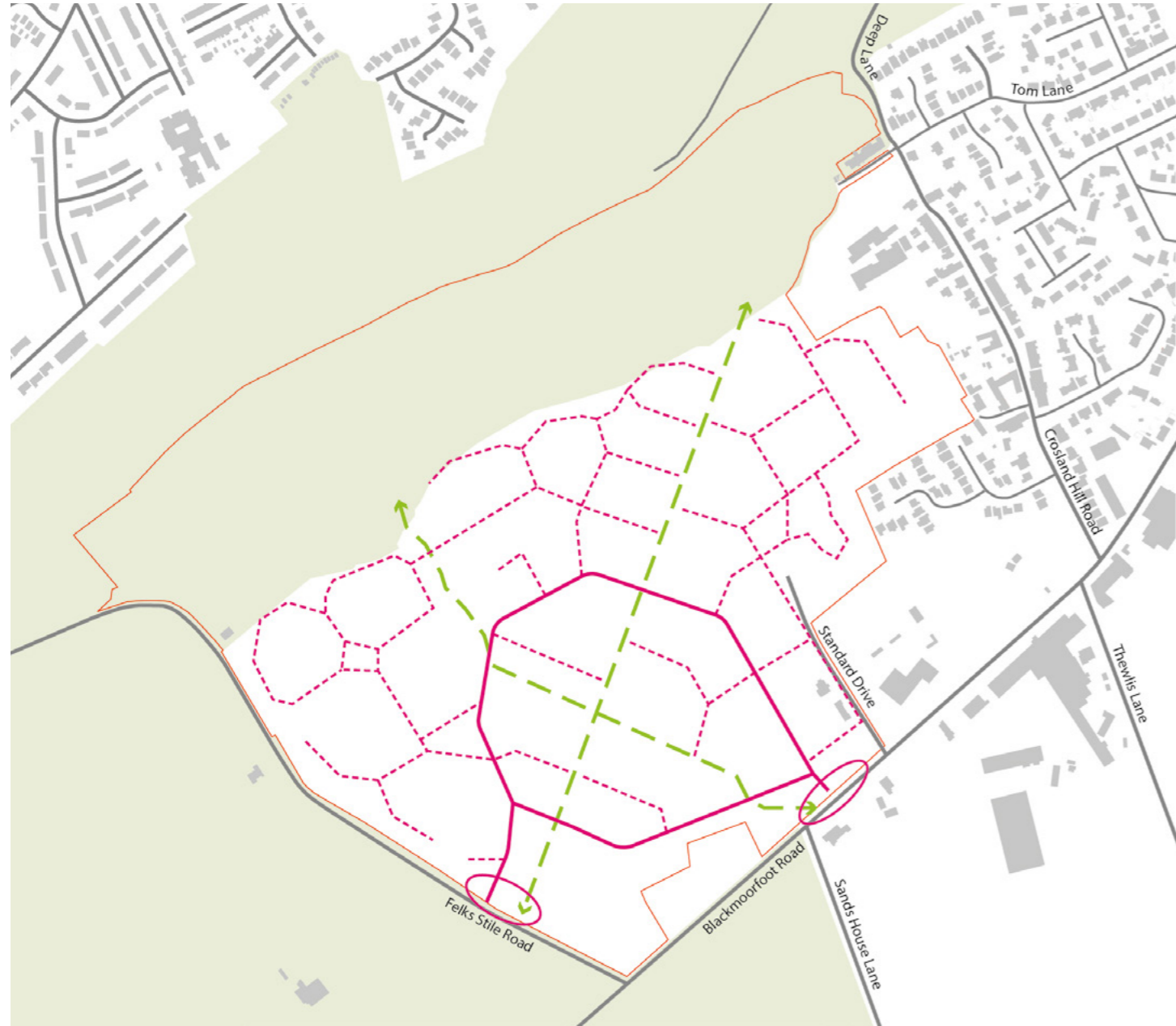
- The site benefits from long ranging views across the valley northwards and south and east towards the surrounding countryside
- Orientation and layout of the development should take advantage of the surrounding views, whilst being mindful of how visible the scheme may be, particularly from the adjacent village along Crosland Hill Road and along the edge of the valley
- Sensitive design, with regards to scale, mass, rooflines and materiality will help to mitigate any issues.

WORK WITH THE EXISTING SITE FEATURES & THE 'MEMORY' OF THE SITE



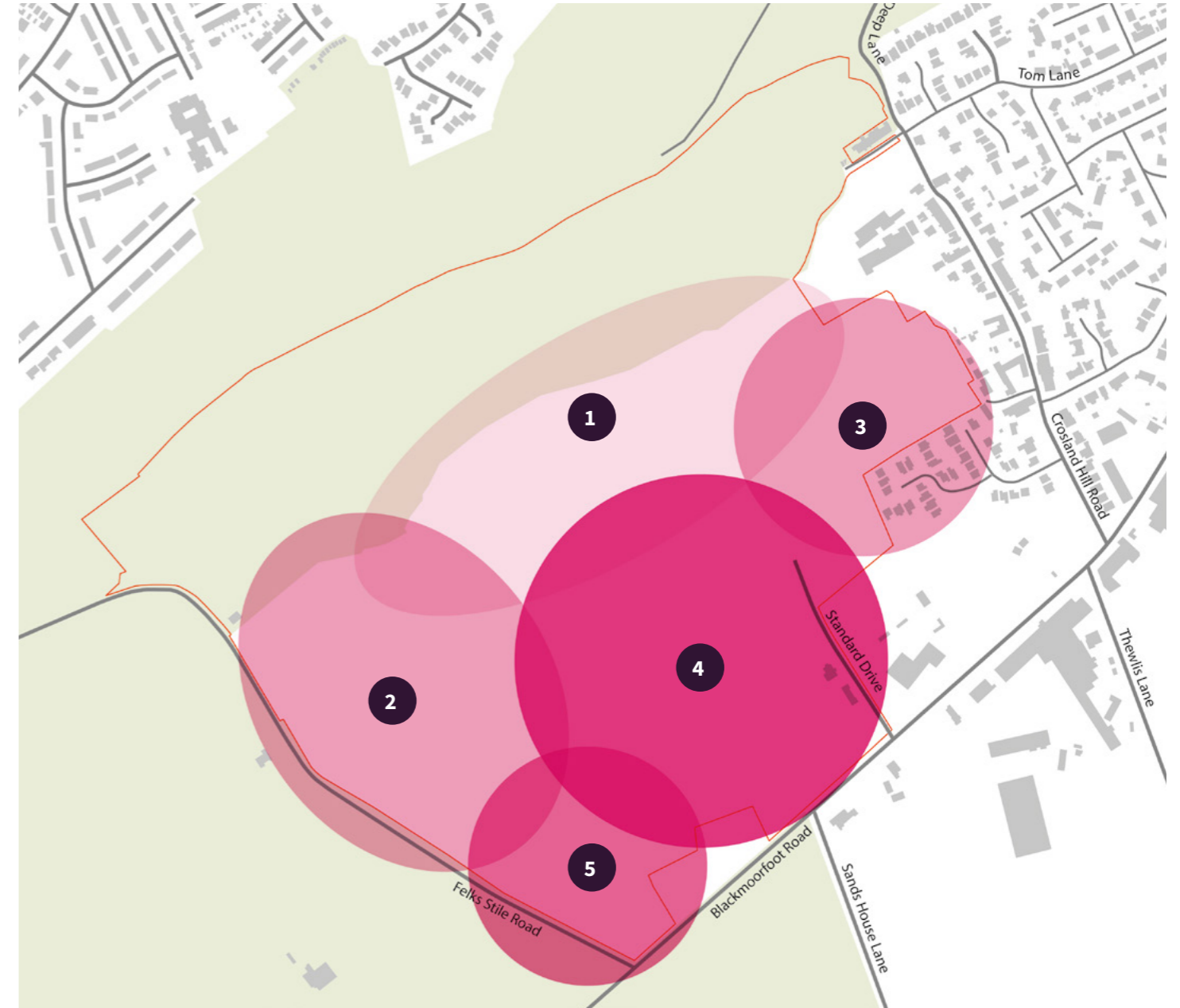
- Some of the existing site features are clear reminders of the site's history and varying land uses. These include:
 - Old quarries and mounds
 - Stone walls
 - Factory buildings, platforms and associated names
- These features could influence the masterplan and help to create a strong sense of place, either through retention and reuse, mimicking alignments, place-name references or reuse of materials.

CREATE A SUCCESSFUL NETWORK OF STREETS



- New spine road through the development connects into the existing road network, with safe points of access that work in relation to junctions and existing traffic capacity
- Street network through the site must work with the topography and create an accessible grid of connected streets which provide adequate access to homes and connections to the surrounding area.

DEVELOP CHARACTER AND DENSITY IN RESPONSE TO THE CONDITIONS OF THE SITE



- Utilise the seven previous principles to create a varied and interesting masterplan with different character areas and a strong sense of place.
- The character areas encompass:
 1. Northern Edge
 2. Western Area
 3. Eastern Edge
 4. Central Development
 5. Extra Care



3
—
OPTION APPRAISAL

OPTION 1



SCHEDULE

Net Developable Area = 23 Ha

Open Space Provision = 3.9 Ha within allocation boundary + 14 Ha within Green Belt

Number of units = circa 695

Average density = 30 DPH

Circa 70 Extra Care Apartments (10%)

3% 5 bed

33% 4 bed

28% 3 bed

16% 2 bed

OPTION 2



SCHEDULE

Net Developable Area = 20.3 Ha

Open Space Provision = 6.6 Ha within allocation boundary + 14 Ha within Green Belt

Number of units = circa 675

Average density = 30 DPH

Circa 70 Extra Care Apartments (10%)

3% 5 bed

33% 4 bed

28% 3 bed

16% 2 bed

- KEY**
- 1 MAIN VEHICULAR ACCESS
 - 2 SPINE ROAD
 - 3 VILLAGE GREEN
 - 4 EXISTING PUB
 - 5 RETAIL UNIT (MAX.500MSQ)
 - 6 ARRIVAL SPACE
 - 7 COMMUNITY PARKLAND AREA PROVIDES RECREATIONAL RESOURCE
 - 8 NATURAL PLAY AREA
 - 9 LINEAR PARK PROVIDING ENHANCED CONNECTIVITY TO WIDER LANDSCAPE
 - 10 LINEAR PARK PROVIDING CONNECTIVITY BETWEEN VILLAGE GREEN AND NATURAL PLAY AREA
 - 11 PEDESTRIAN CONNECTION TO SURROUNDING AREA
 - 12 EXISTING STONE WALLS RETAINED
 - 13 EXISTING FIELD RETAINED AS BUFFER BETWEEN CROSLAND HILL ROAD AND NEW DEVELOPMENT
 - 14 COMMUNITY SQUARE
 - 15 POCKET PARK
 - 16 EXTRA CARE

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NOTE:

1. Do not scale from this drawing. Always work to noted dimensions.
2. All dimensions are in millimetres unless otherwise stated.
3. All setting out, levelling dimensions to be agreed on site.
4. The dimensions of all materials must be checked on site before being laid out.
5. This drawing must be read with the relevant specification clauses and detail drawings.
6. Order of construction and setting out to be agreed on site.

SUMMARY OF CHANGES:

- Main axis shift to north-eastern corner in response to change of pedestrian access point to Crosland Hill Road (due to private ownership of Farmhouse Court)
- Introduction of potential local centre including max. 500 sqm. facility located on new village green at entrance to development
- Two key green links incorporated into masterplan; one from main site access/village green to natural play area and one from main site access/extra care to community parkland area. Both provide enhanced connectivity to wider area

SCHEDULE
 Net Developable Area = 21.5 Ha
 Total Open Space Provision = 20.1 Ha
 (7.8 Ha within allocation boundary
 12.3 Ha within Green Belt)

Number of units = circa 700
 Average density = 30 dph

Circa 70 Extra Care apartments (10%)
 3% 5 bed
 32% 4 bed
 42% 3 bed
 23% 2 bed

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00	14.12.17	DRAFT	HB	AR
Issue	Date	Status	Drawn	Apprvd.

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Client: Gerald Eve

Project: Crosland Moor, Huddersfield

Drg Title: Illustrative masterplan Option 3

Created on: 14.12.17 Created by: HB Approved by: AR

Scale: 1250 Size: A1 Status: DRAFT

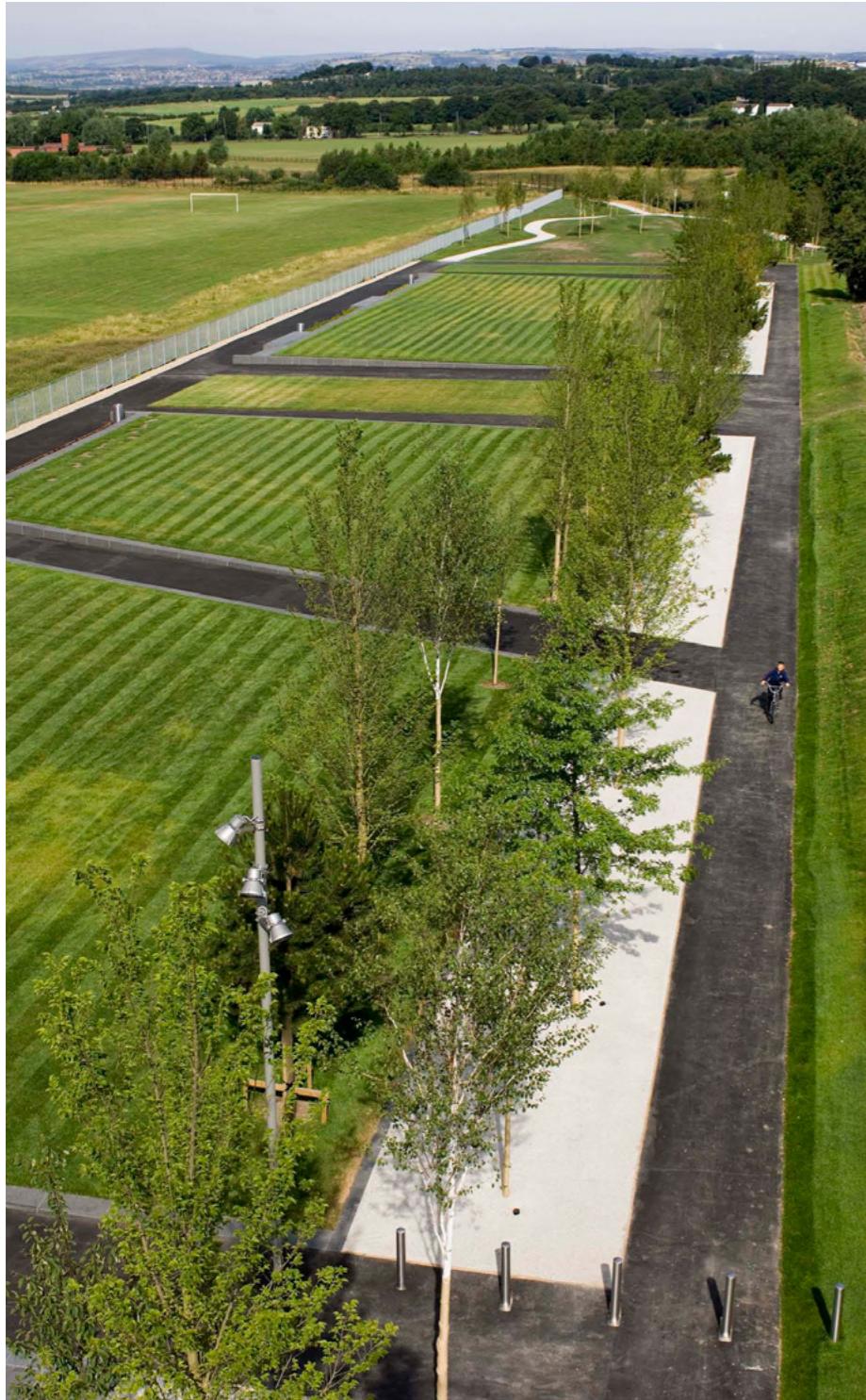
Drg No: PL1713-ID-004-01





4
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PRECEDENTS

4.1 Landscape & open space precedents

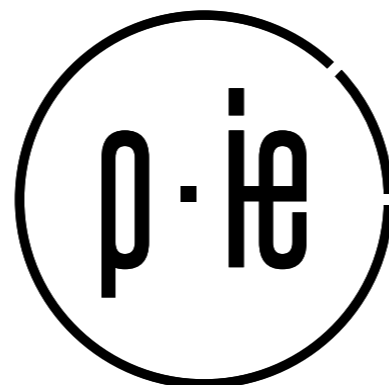


4.2 Built form precedents



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Appendix B

Edited Market Review prepared by Gerald Eve LLP



GERALDEVE

Black Cat Fireworks, Blackmoorfoot Road, Huddersfield

On behalf of: Empire Knight Group

Market Review (Ref MX1930)

January 2018

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5 Summary of Findings and next Steps	22

1 Introduction and Instructions

Instruction

- 1.1 Gerald Eve LLP has been instructed by Empire Knight Group ('the Landowner') to test the viability and deliverability of Kirklees Borough Council's ('the Council') draft allocation (Ref: MX1930) for land and buildings at Blackmoorfoot Road, Huddersfield ('the Site').
- 1.2 The Council's Strategies and Policies document identifies a need to deliver approximately 175 hectares of employment land and after deducting completions and additional supply, the Council proposes to allocate 167 hectares to achieve this requirement.
- 1.3 The Council's draft Local Plan (2016) proposes to allocate the Site for a mixed use development of approximately 50/50 split of housing and employment as set out in the draft Local Plan.
- 1.4 A meeting was held on 15 March 2017 between the Landowner, Gerald Eve and the Council during which it was agreed that Gerald Eve would provide a report regarding the deliverability of the allocation as proposed, both in terms of market demand and financial viability, building on earlier representations submitted on behalf of the Landowner as part of the Local Plan process.

Purpose

- 1.5 The purpose of this report is to assess the suitability of the Site in delivering the draft mixed use allocation and specifically the employment element. In doing so, we have had regard to the Site's characteristics and constraints, the local planning policy, market supply and demand levels and have undertaken soft market testing through consultation with developers and local operators to understand the market appetite.

1.6 To support this assessment, a number of technical and site surveys have been undertaken as follows:

- Topographical Survey;
- Planning Appraisal;
- Geo-Environmental Survey;
- Transport appraisal and traffic surveys;
- Ecological survey; and
- Initial masterplanning and site capacity advice.

1.7 The structure of the remainder of this report is set out as follows:

2. Background and Site Description;
3. Planning Summary;
4. Market Assessment; and
5. Summary of findings and next steps

2 Background and Site Description

This section provides the context for the Site focussing on the surrounding area, accessibility, the Sites characteristics, constraints and the existing use.

Location

- 2.1 The Site is located on Blackmoorfoot Road in the Crossland Heath area of South West Huddersfield, Kirklees. The Site is located approximately 2.2 miles (3.6 km) south west of Huddersfield town centre.

Location Plan of the Site



Source: Google Maps

Situation

- 2.2 The Site is situated adjacent to Crossland Health Golf Course to the west, residential neighbourhoods to the north and east and Crossland Moor Airfield and Johnson Wellfield Quarry to the south.
- 2.3 The Site is currently accessed from Standard Drive off Blackmoorfoot Road which is predominantly a rural road and provides access to links to Huddersfield town centre to the east and the Peak District National Park to the west. The M62 motorway is located approximately 1.2 miles (2 km) North West of the Site, however, access to the M62 motorway is convoluted via a number of A and B roads.

Description

- 2.4 The extent of the Landowner's Site includes approximately 100 acres (40 hectares) of land within which the gross developable area is approximately 69 acres (28 ha). The majority of the Site is used for the storage and distribution of fireworks (occupied by Black Cat Fireworks Limited), with the remainder comprising low-grade, tenanted agricultural land. Part of the Site to the north lies within the Green Belt.

Site Characteristics

- 2.5 The Site contains a number of existing industrial buildings which are predominantly surrounded by greenfield land. The Site is split level with the Green Belt element separated by a steep gradient.

- 2.6 The current use requires the Site to be subject to the Control of Major Accident Hazard Regulations 2015 ('COMAH') and also regulated by the Health and Safety Executive for the purpose of the Explosives Regulations 2014. Some quarry activities have previously been carried out on the Site which has resulted in areas of made ground and which may require remediation and site preparation works, as identified within the geo-environmental survey results.
- 2.7 The Site is accessed via Blackmoorfoot Road, a single lane, single carriageway in a rural location. This would make access to and from the Site difficult for Heavy Goods Vehicles ('HGV's').

Site Constraints

- 2.8 We consider that the Site possesses a number of constraints, particularly when considering the potential development for employment uses. The key constraints are summarised as follows:
- Transport - access to the Motorway and strategic road networks is poor for commercial traffic and the immediate road network is unlikely to be suitable for increased Heavy Goods Vehicles (HGV) traffic;
 - Level changes within the Site – the Site includes a level change of 50 metres from west to east and may constrain unit sizes and positions and would require significant earthworks incurring commercially prohibitive costs;
 - Ground conditions – could present difficulties for redevelopment, and/or require extensive and expensive remediation works ;
 - Current use/previous uses – in terms of demolition, contamination and remediation; and
 - Potential service/utility constraints – could require significant improvements to existing network, which would likely incur significant cost.

3 Planning Summary

This section of the report provides an overview of the relevant background evidence associated with the Site and which forms part of the Council's draft Local Plan.

Introduction

- 3.1 We note that previous representations to the Kirklees Local Plan Publication Draft were submitted on behalf of Empire Knight Group by GVA (December 2016), which concluded that the Site was not suitable to deliver the employment allocation based on the Site's characteristics.
- 3.2 In order to provide the Council with adequate evidence to support the earlier representations this assessment has considered the following background documents:
- Kirklees Publication Draft Local Plan – Allocations and Designations (Ref: MX1930);
 - Kirklees Draft Local Plan Employment Needs Assessment (2016); and
 - Kirklees Employment Land Supply Review (2015).

Kirklees Publication Draft Local Plan – Allocations and Designations

- 3.3 Huddersfield is located within the Kirklees local authority catchment area. The 2016 draft Local Plan proposes to allocate the Site as a mixed use redevelopment opportunity (Ref: MX1930) which identifies c.73 gross acres (29 hectares) 62.5 net acres (25 hectares) of the Site for a mixture of housing and employment uses. An indicative capacity has been set out for 441 dwelling houses and 44,258 sq. m (476,393 sq. ft.) employment. The type of employment space is not restricted (i.e. open Use Class B) and the remainder of the Site is identified as Green Belt.

3.4 The draft Local Plan Allocations and Designations (2016) identifies the Site to possess the following constraints:

- *“The provision of a pedestrian footway is required across the site frontage;*
- *Improvements to local highway links may be required;*
- *Potentially contaminated land;*
- *Air quality issues;*
- *Odour source near site;*
- *Noise source near site;*
- *Site is close to listed buildings; and*
- *Site is in an area that affects the setting of Castle Hill.”*

3.5 The allocation identifies the following site specific considerations:

- *“Landscape character assessment has been undertaken for this site which should be considered in the development masterplan;*
- *The flood risk vulnerability of proposed uses will be considered and an exception test may still be required as part of a planning application as set out in national planning policy;*
- *Residential amenity will need safeguarding through sensitive siting of buildings and landscape buffer areas; and*
- *Development may need to contribute to improvements to the strategic road network if committed schemes will not provide sufficient capacity.”*

Employment Land

3.6 For the purposes of this draft allocation, the term ‘employment’ means activities and jobs in any of the following Use Classes:

- B1 Business
 - B1(a) Offices
 - B1(b) Research and Development
 - B1(c) Light Industry
- B2 General Industry
- B8 Storage and distribution.

Employment Needs Assessment (November 2016)

3.7 The Council’s Employment Needs Assessment identifies that it:

“included a survey of local agents who provided a qualitative overview of the commercial property market in Kirklees. All agents believed that demand for larger sites was evident in the district but the ability to meet this demand was constrained by the lack of well-located high quality employment sites. There continues to be a strong preference for quality sites in good locations benefiting from good connectivity particularly to the strategic road network.”¹

3.8 Kirklees Employment Needs Assessment concludes that the current employment land portfolio is *“insufficient in terms of both quantum and quality.”²*

“Taking account of past take-up data, the district has seen predominantly minor extension and new builds occur. These have generally served SME operations within the Local Economy and limited the opportunity to secure inward investment opportunities and the growth aspirations of the districts

¹ Paragraph 7.2 page 36 Employment Needs Assessment

² Paragraph 8.2 page 38 Employment Needs Assessment

*larger indigenous businesses.*³

- 3.9 We note that the Assessment sets out a requirement of 108 hectares (267 acres) of new employment land. However, as 39ha (96 acres) of land has been consolidated from extant allocations within the Kirklees Unitary Development Plan, the Council only needs to allocate an additional 69 ha (170 acres) in order to meet the 108 ha (267 acres) target. The Council's assessment confirms that the Local Plan seeks to allocate in the region of 120 ha (297 acres) to ensure sufficient land is available to achieve the target.⁴
- 3.10 With this in mind, should the draft allocation fail to deliver employment development (equal to approximately 11 ha (27 acres)), the Council's target of delivering a net increase of 69 ha (170 acres) is unlikely to be jeopardised.
- 3.11 Furthermore, it is noted that the Council has further revised its supply of allocated employment land to 167 ha to account for an increased net requirement of 91 ha, as set out within the *Response from Kirklees Council to Initial note from the Inspector to the Council (Part 2)* dated 16 June 2017. As such, the potential loss of 11ha from site reference MX1930 would still leave more than enough spare supply allocated to meet the target requirement.
- 3.12 The Council's Assessment also states '*it needs to ensure new prime sites are brought forward to address these previous barriers to growth.*'⁵
- 3.13 We note that the Assessment identifies that Crossland Moor has a historic take-up rate of employment land between 2005/06 and 2013/14 of less than 1 hectare (for the 8 year period) and the majority of employment land take-up has been from the eastern part of Kirklees. This suggests that the market demand for employment land in the Site's surrounding area is weak.⁶
- 3.14 It is noted that this period included years of national economic recession and

³ Paragraph 8.2 Employment Needs Assessment

⁴ Paragraph 8.4 Employment Needs Assessment

⁵ Paragraph 8.4 Employment Needs Assessment

⁶ Map 1 page 30

further work is likely to be necessary in considering how future take-up rates may differ (see Section 5); however, even if market conditions exceeded expectations over the next 5-10 years, it is considered unlikely that take-up rates in this part of the borough would result in a substantial difference.

3.15 The Assessment identifies evidence from the employer's survey, which suggests key locational criteria including:

- Proximity to the major road network (including motorway junctions).

Employment Land Supply Review (2015)

3.16 The Site is not considered as part of the Employment Land Supply in 2015 within the identified sites schedule, although we note that this document precedes the draft Local Plan – Allocations and Designations. It is therefore assumed that the allocation of employment land as part of site reference MX1930 was a decision taken by the Council relatively recently and has not formed a long-standing or critical part of the Council's employment land supply.

4 Market Assessment

This section sets out the market assessment for employment uses at the Site. We have looked at market supply and demand and undertaken soft market testing to understand the suitability of delivering the Site when having regard to the local market.

Introduction

- 4.1 Having regard to the Employment Land Needs Assessment and the Employment Land Supply Review, with considerations to the background context of GVA's representation report, we have assessed what we consider to be the most appropriate use for the employment element of the draft Site allocation.
- 4.2 To inform our opinion, we have undertaken soft market testing with commercial developers and local operators to understand the market appetite for the Site

Market Supply & Demand

- 4.3 The surrounding area is characterised by local businesses with very few national occupiers with the majority of stock coming in the form of converted buildings.
- 4.4 Linthwaite Business Centre, located on Manchester Road (A62) is the closest existing employment site other than the Site. This provides approximately 2,300 sq. m (25,000 sq. ft.) of employment space and benefits from superior road infrastructure when compared to the subject Site.
- 4.5 We understand that Linthwaite Business Centre is approximately 80% occupied, all of which by local businesses on flexible lease terms. We understand that rental values range from between £4 and £6 per sq. ft.

-
- 4.6 Given the supporting road infrastructure, rental values for Linthwaite Business Centre are likely to be at higher than what could be achieved at the Site.
- 4.7 Queen Square Business Park is considered to be one of the primary out-of-town employment centres in Huddersfield with rents achieving levels greater than the town centre. This business park is located approximately 4km (2.5 miles) south of Huddersfield and benefits from superior transport links as the site is located on the A616 which provides direct links into Huddersfield town centre and with Honley train station being located approximately 0.5km (0.3 miles) to the east.
- 4.8 We understand that one of the primary characteristics for this business centre is that it is located close to one of the more desirable housing areas in Huddersfield. This factor has resulted in a number of the occupiers of the residential area occupying space with the view of working closer to home and which has therefore made this business park highly desirable.
- 4.9 We understand that typical industrial rents achieve £5.25-£5.50 per sq. ft. and full repairing terms and insuring office leases achieve between £8 and £10 per sq. ft. or £15 per sq. ft. for internal repair leases only.
- 4.10 There is currently a high level of market supply within the surrounding areas of the Site. We set out a summary of the available employment spaces (as of August 2017) in Table 4.1.

Table 4.1: Available Employment Space in surrounding areas

Ref	Property	Use	Area (sq. ft.)	Quoting rent
1	7-9 Bent Ley Road, HD9 4AP	Office	611	£3.29
2	1-1 A New Street, HD7 5AB	Office	1,660	£5.94
3	Marsh Mills, Luck Lane, HD3 4AB	Light Industrial	10,917	£1.40
4	B1-B8, Gledholt Business Park, HD1 4SB	Industrial	1,632	£5.97
5	Units 2-5, The Triangle Business Park, HD1 4RR	Industrial	939	£4.79
6	Unit BL2, Bent Ley Industrial Estate, HD9 4AP	Industrial	19,149	£4.70
7	Railway Sawmills, Burbeary Road, HD1 3UN	Industrial	3,546	£7.00
8	Springfield Mills, Dale Street, HD3 4QY	Industrial	5,960	£5.20
9	O Block, Metham Mills Industrial Estate, Knowles Lane, HD9 4AR	Industrial	19,163	£2.97
10	P Block, Meltham Mills, Knowles Lane, HD9 4AR	Industrial	9,148	£4.51
11	Unit N10, Knowles Lane, HD9 4DS	Industrial	6,936	£3.60
12	Block L, Meltham Mills, Knowles Lane, HD9 4DS	Industrial	13,998	£3.00
13	Units D12-D13, Metham Mills Industrial Estate, Knowles Lane, HD9 4DS	Industrial	3,023	£4.63
14	Unit N7, Meltham Mills Industrial Estate, Knowles Lane, HD9 4DS	Industrial	4,830	£4.55
15	Meltham Mills Industrial Estate, HD9 4AR	Industrial	47,222	£2.50
16	Former Universal Engineering Workshop, New Street, HD4 7EZ	Industrial	7,385	£3.25
17	Units 1-9 Springfield Mills, Royd Street, HD3 4TG	Industrial	7,632	£5.55
18	Colne Valley Business Park, Spring Grove, HD7 5QG	Industrial	3,813	£3.45
19	Holme Mills, West Slaithwaite Road, HD7 6LS	Industrial	2,175	£5.06
	Average		8,900	£4.28

Source: CoStar Suite (August 2017)

- 4.11 Table 4.1 demonstrates that there is 169,739 sq. ft. (circa 15,800 sq m) of employment space currently available on the market in the surrounding area, which clearly demonstrates that there is currently a high level of supply of employment space.
- 4.12 The information presented in Table 4.1 also demonstrates that there is a limited amount of office space available on the market.
- 4.13 Quoting rents for the area range from c. £1.40 per sq. ft. to c. £7 per sq. ft. for industrial uses and c. £3.30 per sq. ft. to c. £6 per sq. ft. for offices. The average rental values for industrial space equate to c. £4.25 per sq. ft. and £4.62 per sq. ft. for offices.
- 4.14 We are aware of a number of investment comparables for sites located in the surrounding area to the Site (as of August 2017). These transactions are set out in Table 4.2.

Table 4.2: Investment Sales

Ref	Property	Use	Area (Sq. ft.)	Sales Value	£/sq. ft.	Yield
1	Part Meltham Mills, Beny Ley Road, HD9 4AP	Industrial	27,915	£535,000	£19.17	10.84%
2	Colne Vale Works, Colne Vale Road, HD3 4NY	Industrial	8,974	£220,000	£24.52	8.00%
3	Units 1-10 Newhaven Business Park, Lowergate, HD3 4HS	Industrial	7,144	£ 330,000	£46.19	12.60%

Source: CoStar Suite (August 2017)

- 4.15 The transactions presented in Table 4.2 show that yields range from circa 8% to 13%. We have also discussed the potential yield profile for the area with local agents who consider this range is in line with the market.
- 4.16 We have had regard to commercial land values for the area. Due to limited market evidence in the immediate vicinity, we have assessed values of

employment land across Kirklees (as of August 2017). These comparables are summarised in Table 4.3.

Table 4.3: Employment land values

Ref	Property	Date	Area acres	Sales Value	£/acre	Comments
1	Dyson Wood Way, Bradley Business Park, HD2 1GN	Under offer	0.53	£168,000	£316,981	Site benefits from outline planning permission for B1 development. Site located north east of Huddersfield town centre within close proximity to the M62. Site superior due to road network.
2	Dyson Wood Way, Bradley Business Park, HD2 1GN	Under offer	0.91	£327,000	£359,341	Site benefits from outline planning permission for B1 development. Site located north east of Huddersfield town centre within close proximity to the M62. Site superior due to road network.
3	Leeds Road, Dewsbury, WF12 7RQ	On Market	0.84	£500,000	£595,238	Superior road network will make this more valuable for employment uses. Site has potential for a hotel, showroom, retail or office accommodation.
4	New Mill Road, Neiley East Waterworks, Holmfirth, HD9 6QE	Under offer	1.90	£475,000	£250,000	Site located in one of more desirable residential areas in Kirklees in a similar location to Queen Square Business Park, regarded as one of the better locations for out of town employment with strong transport connectivity.
5	Saville Street, Batley, WF17 6JS	On Market	0.34	£85,000	£250,000	Site benefits from close connections to M62 in a desirable area of Kirklees for employment users.
6	New Mill Road, Holmfirth, HD9 7LN	Jan-16	6.40	£600,000	£93,750	Road benefits from being located on A635 with prominent roadside position which may be attractive to retail users.
7	Site at Neiley Waterworks, new Mill Road, Holmfirth, HD9	Feb-16	1.42	£380,000	£267,606	Purchased with planning permission for c.26,000 sq. ft. industrial space.

	6QE					
8	Calder Works, Thornhill Road, Dewsbury, WF12 9QE	Feb 16	4.06	£1,000,000	£246,305	Cleared site. Martech Ltd has purchased the freehold interest in Calder Works comprising 176,854 sq. ft. (16,430 sq. m) of land from British Millerrain Pension Fund for £1,000,000. The quoting price was £1,400,000. Hanson Chartered Surveyors acted on behalf of British Millerrain Pension Fund. Site close to Dewsbury and in a more prominent location for employment uses with superior road networks.

Source: CoStar Suite (August 2017)

- 4.17 The evidence presented in Table 4.3 shows that land values for employment uses across Kirklees range from between c. £94k and £600k per acre. This is of course dependent on the planning status, characteristics and location of the site.
- 4.18 Based on the information presented in Table 4.3, we consider that out of all of the comparables, those located within Holmfirth represent the most comparable by location as it is south of Huddersfield and in a relatively rural area of Kirklees.
- 4.19 However, we consider Holmfirth to be a superior area to that of the locality of the Site. This is based on better access to the road network via the A616 compared with Blackmoorfoot Road, and also access to Henley and Blackholes train station and therefore occupier interest and land values are likely to be superior to what could reasonably be expected for the Site for employment use. Those comparables set out in Table 4.3 based in Holmfirth show that land values range from c. £94k to £270k per acre. Although we note the upper end of their range is based on sites of less than 2 acres and those at the lower end of the range are significantly larger. This demonstrates that land values dilute as land areas increase on a £/acres basis.
- 4.20 At this stage, our initial view is on the potential land value of the Site for the

purposes of employment land is that it could be worth between circa £80k and £100k per net developable acre.

Market Consultation

- 4.21 We have discussed the proposed employment element of the Site with commercial developers and local operators to understand the market appetite and the Site's potential for commercial development. The general view for the Site would be that whilst it may be of interest to smaller, local occupiers (subject to such development being financially and commercially viable), the location of the Site and road infrastructure network would not make the Site suitable for larger scale commercial development.
- 4.22 The current road network infrastructure will impact the Site's desirability and we consider that it would be difficult to attract any high profile or occupiers for large floorplates, but rather local, independent businesses. This will have an impact on the likely achievable rental values and yields that could be achieved and would therefore impact on the overall value of the employment space. This will be a key factor for any commercial developer.

Table 4.4: Market Consultation

Operator	Comments
Commercial Developer	The Site suffers from the location and road infrastructure and is not a site which would lend itself to a commercial development. The Site would be a good residential opportunity and it would not likely be of interest for employment uses.
Commercial Developer	Considers the Site to have limited employment demand, however, feels that there is too much similar employment space being delivered elsewhere across the borough. This developer is dealing with a similar site in Macclesfield where employment demand next to a residential development has been relatively low.
Local Agent	<p>Site is not in the most prominent location to provide employment uses. Rental values would need to generate c. £6 per sq. ft. to achieve an 8% yield which may be difficult based on characteristics. Linthwaite currently possesses a lot of converted stock with a lot of space still available on the market, achieving rents of between £1.25 and £2 per sq ft.</p> <p>Queen Square business park is one of better out of town employment sites with rents for industrial achieving up to £5.50 psf and offices at around c. £10 psf. However, this area is superior to Linthwaite area.</p> <p>Limited new office stock on the market other than town centre.</p>
Business Centre Operators	<p>Industrial space tends to have strong demand levels, however, condition of the units and access are the key drivers and it is vital that HGV's can access the site.</p> <p>Linthwaite Business Park achieves rents of between £4 and £6 per sq ft. with the upper end being achieved at the best units on the site.</p> <p>All occupiers are local.</p> <p>Business park provides around 25,000 sq ft. and is around 80% occupied.</p>

Source: Various (confidential)

4.23 The information presented in Table 4.4 above currently supports the considerations that that the Site has very limited market appetite for employment development.

Costs to deliver an employment scheme

4.24 The market evidence presented in the preceding tables in this section indicates that there is likely to be very limited demand for the Site for employment purposes. Based on the Site's characteristics and road network infrastructure, land values of approximately £100,000 per net developable acre are most likely what could be achieved within the area.

5 Summary of Findings and next Steps

In this section, we provide a summary of the initial findings in respect of the feasibility of delivering employment development as part of the proposed Local Plan allocation for the Site. Further, we identify some further work that might be necessary to support both the Local Plan process as well as any planning application that might come forward.

Summary of Findings

5.1 Whilst the Site has been identified in the emerging Local Plan to provide a mixture of residential and employment uses, we consider that the characteristics of the Site and local market will make this delivery unachievable.

Site Characteristics

5.2 We consider that the Site possesses a number of constraints particularly when considering the potential development of employment uses, namely:

- Transport - access to the Motorway and strategic road network is poor for commercial traffic and the immediate road network is unlikely to be suitable for increased heavy goods traffic;
- Level changes across the Site – potential constraint on unit sizes and positions;
- Ground conditions;
- Current use/previous uses – in terms of demolition, contamination and remediation; and
- Potentially service/utilities constraints.

Supply

- 5.3 There is a high level of employment space currently available on the market in the local area which shows that there is high level of market supply.
- 5.4 Delivering 44,000 sq m (474,000 sq ft.) of employment buildings within this area will likely result in a low occupancy rate with low rental income streams which would make this an unviable return for developers.

Market Demand

- 5.5 The Council's Employment Needs Assessment requires commercial sites to be *"quality sites in good locations benefiting from good connectivity particularly to the strategic road network."* This Site does not meet this criterion.
- 5.6 There is a demand according to the Kirklees Employment Needs Assessment for *"well-located high quality employment sites with good connectivity particularly to the strategic road network."* The Site does not have good connectivity to the strategic road network and therefore would not be a well located high quality employment site. This is highly unlikely to change over the Local Plan period.
- 5.7 The proposed supply of employment land to be allocated within the Local Plan (167 ha) significantly exceeds the estimated net requirement (91 ha). Removing the employment element from the mixed use allocation for this Site would not prohibit the Local Authority in achieving their employment land delivery.
- 5.8 Historical take-up levels demonstrate that employment demand for the Crossland Moor area is low (approximately 1 ha per annum over 8 years). Applying this historic level of take up to the Site would mean that the proposed employment provision could take approximately 90 years to be fully let. Whilst we recognise that this period included one of the most significant recessions in recent history, applying an optimistic approach by doubling the take up would still result in the take-up period for this site equating to approximately 45 years.

5.9 Soft market testing with developers and local agents has supported these considerations with each of these concluding that the Site is not suitable or attractive for employment purposes.

Appendix C

Historic Environment Desk-based: Non-Technical Summary

Non-Technical Summary

The Site is located near Huddersfield and is centred on National Grid reference SE 11333 14819, and covers an area of approximately 29.3 ha, at Crosland Hill, to the south of the River Colne.

The relevant designated heritage assets, located within the study area, but outside the Site, and considered in this assessment include:

- Milnsbridge - Conservation Area;
- Crosland Hall – Grade II* Listed;
- Range of Farm Buildings at Crosland Hall – Grade II listed;
- Crosland Hall Cottage – Grade II listed;
- 41 and 43 Crosland Hill Road – Grade II listed;
- 67 and 69 Crosland Hill Road – Grade II Listed; and
- 100-104 Crosland Hill Road – Grade II Listed.

Thewlis Lane and the fields to the north of it, within the Site, are assessed in relation to the contribution they make to the setting of the Grade II* listed Crosland Hall, the associated Grade II listed Crosland Hall cottage and range of farm buildings at Crosland Hill.

Non-designated assets within the Site, and considered in the assessment are as follows:

- Stone wall field boundaries identified in the Tithe and First Edition OS, and still extant within the Site;
- Quarry areas; and
- Extant buildings and structures associated with the industrial use of the site for fireworks production.

The proposed development includes mitigation inherent to the design, such as retention of extant stone wall boundaries within the Site wherever possible, and a community park retaining an area of quarry. Thewlis Lane and the field to the north of it make a significant contribution to the setting of the Grade II* listed Crosland Hall, and are therefore also partially retained within the Masterplan.

Building recording of extant historic structures within the Site, including buildings and stone walls, is recommended prior to demolition, where health and safety permits.

All statements and recommendations made in this assessment are subject to consultation and approval of the local planning authority and their statutory consultees.

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